

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF WARREN POLICE AND FIRE
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WORLD WRESTLING ENTERTAINMENT,
INC., VINCENT K. McMAHON, GEORGE A.
BARRIOS, and MICHELLE D. WILSON,

Defendants.

No. 20 Civ. 2031 (JSR)

DECLARATION OF NEIL P. KELLY

NEIL P. KELLY declares pursuant to 28 U.S.C. § 1746:

1. I am an associate at Paul, Weiss, Rifkind, Wharton & Garrison, LLP, counsel for defendants World Wrestling Entertainment, Inc., Vincent K. McMahon, George A. Barrios, and Michelle D. Wilson in the above-captioned action. I am a member in good standing of the Bar of the State of New York and of this Court. I respectfully submit this declaration to place before the Court certain exhibits referenced in Defendants' Memorandum of Law in Opposition to Lead Plaintiff's Motion for Class Certification, Appointment as Class Representative, and Appointment of Class Counsel, dated November 3, 2020.

2. Attached as Exhibit A is a true and correct copy of a document produced by William Blair titled "Detailed Transaction Summary" for the Firefighters' Pension System of City of Kansas City, Missouri from May 31, 2011 to August 1, 2020, which bears the Bates number WILLIAM BLAIR_000705.

3. Attached as Exhibit B are true and correct copies of excerpts from the transcript of a remote videotaped deposition of Barbara Davis taken on October 23, 2020.

4. Attached as Exhibit C is a true and correct copy of an email and attachment produced by William Blair from Lauren Thompson to Jim Jones, Daniel Crowe, Rob Lanphier, David Fording, Ward D. Sexton, and Derek Maleh with the subject line “WWE updates,” dated May 29, 2019, which bears the Bates number WILLIAM BLAIR_000069.

5. Attached as Exhibit D is a true and correct copy of an email and attachment produced by William Blair from Lauren Thompson to Daniel Crowe, Rob Lanphier, David Fording, Ward D. Sexton, Jim Jones, and Derek Maleh with the subject line “WWE write up attached,” dated July 22, 2019, which bears the Bates number WILLIAM BLAIR_000082.

6. Attached as Exhibit E is a true and correct copy of an email and attachment produced by William Blair from Lauren Thompson to Daniel Crowe, Rob Lanphier, David Fording, Ward D. Sexton, Jim Jones, and Derek Maleh with the subject line “WWE,” dated July 25, 2019, which bears the Bates number WILLIAM BLAIR_000163.

7. Attached as Exhibit F are true and correct copies of excerpts from the transcript of a remote videotaped deposition of Lauren Thompson taken on October 27, 2020.

8. Attached as Exhibit G is a true and correct copy of a document produced by William Blair bearing Bates number WILLIAM BLAIR_000344.

9. Attached as Exhibit H is a true and correct copy of a document produced by Firefighters’ Pension System of the City of Kansas City, Missouri Trust titled “Investment Management Agreement,” effective as of May 11, 2011, bearing Bates number WWE_KCFIRE_00000211.

10. Attached as Exhibit I is a true and correct copy of a document produced by Firefighters' Pension System of the City of Kansas City, Missouri Trust titled "Second Amendment to the Investment Management Agreement," effective as of June 27, 2014, bearing Bates number WWE_KCFIRE_00000205.

11. Attached as Exhibit J is a true and correct copy of an excerpted email exchange between Christine Fox and Richard Tarlowe, Alec Coquin, Carol C. Villegas, Charles Farrell, Daniel J. Kramer, Justin Anderson, Melissa Felder Zappala, and Derick Cividini with the subject line "RE: WWE - CW-1," dated October 14, 2020.

12. Attached as Exhibit K is a true and correct copy of an email produced by Firefighters' Pension System of the City of Kansas City, Missouri Trust from Heidi Brown to [CW-1] with the subject line "WWE Litigation," dated June 9, 2020, bearing Bates number WWE_LeadPlaintiff_CW_00000018.

13. Attached as Exhibit L is a true and correct copy of an email from Alec Coquin to Richard Tarlowe, Daniel J. Kramer, Justin Anderson, Melissa Felder Zappala, Carol C. Villegas, Charles Farrell, Michael P. Canty, Ross Kamhi, Joseph Cotilletta, and Christine Fox with the subject line "WWE - Class Certification," dated September 23, 2020.

14. Attached as Exhibit M is a true and correct copy of a document produced by Firefighters' Pension System of the City of Kansas City, Missouri Trust titled "Minutes of the Board of Trustees of the Firefighters' Pension System of the City of Kansas City, Missouri Trust" dated April 24, 2020, bearing Bates number WWE_KCFIRE_00000520.

Executed on November 3, 2020
New York, New York

By: 
Neil P. Kelly